

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1

**LOWENSTEIN SANDLER LLP**

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*Counsel to the Liquidating Trustee*

In re:

NEW ENGLAND MOTOR FREIGHT, INC, et al.<sup>1</sup>

Debtors.

Chapter 11

Case No.: 19-12809 (JKS)

Hearing Date: 11/22/22 at 10:00 a.m. (ET)

**ADJOURNMENT REQUEST**

1. I, Michael Papandrea, an attorney with Lowenstein Sandler LLP, counsel for the Liquidating Trustee appointed in the above referenced chapter 11 cases (the “Liquidating Trustee”), hereby request an adjournment of the following matters for the reasons set forth below:

- Matter: *The Liquidating Trustee’s Ninth Omnibus Objection To Certain Late Filed Claims* [Docket No. 1640], solely with respect to Claim No. 1374, filed by Hartford Fire Insurance Company.

Current Hearing Date: November 22, 2022 at 10:00 a.m. (ET).

New Hearing Date Requested: December 13, 2022 at 10:00 a.m. (ET).

New Objection Deadline Requested: December 6, 2022

New Reply Deadline Requested: December 9, 2022

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor’s taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC(4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMFLogistics, LLC (4666).

Reason for adjournment request: The parties are in continued discussions regarding a potential consensual resolution of the claim.

- Matter: *The Liquidating Trustee's Tenth Omnibus Objection To Certain Claims to be Reduced and/or Reclassified, or Disallowed Entirely* [Docket No. 1641] (the "Tenth Omnibus Claim Objection"), solely with respect to Claim No. 1370, filed by Mansfield Oil Company of Gainesville, Inc.<sup>2</sup>

Current Hearing Date: November 22, 2022 at 10:00 a.m. (ET).

New Hearing Date Requested: December 13, 2022 at 10:00 a.m. (ET).

New Reply Deadline Requested: December 9, 2022

Reason for adjournment request: The parties are in continued discussions regarding a potential consensual resolution of the claim.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below).

I certify under penalty of perjury that the foregoing is true.

Date: November 18, 2022

/s/ Michael Papandrea  
Signature

**COURT USE ONLY:**

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The request for adjournment is:

☒ Granted New hearing date: 12/13/2022 @ 10:00 ☐ Peremptory

☐ Granted over objection(s) New hearing date: \_\_\_\_\_ ☐ Peremptory

☐ Denied

**IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.**

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<sup>2</sup> The Tenth Omnibus Claim Objection had also previously been adjourned with respect to Proof of Claim No. 913 filed by Walmart Inc. However, Walmart Inc.'s deadline to respond to the Tenth Omnibus Objection has expired with no response having been filed by Walmart Inc. Therefore, the Liquidating Trustee intends to submit a proposed order disallowing and expunging Proof of Claim No. 913 filed by Walmart Inc.